

151. On June 18, 2011 at approximately 6:45 a.m. of that day this plaintiff was lawfully at or near 2095 Honeywell Avenue, apartment 2E thereof when members of the "POLICE", including the defendants herein, of the defendant "CITY" responded to said premises, breaking the door, physically assaulting this plaintiff;
152. This plaintiff was lawfully at said location;
153. This plaintiff was falsely imprisoned at the scene of occurrence, continuing thereafter in the police van, the 48th precinct and Central Booking;
154. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for his life, and sustained severe and other consequential damages;
155. This plaintiff intends to claim punitive damages for all counts;
156. The criminal action against this plaintiff was disposed of as follows:

Case dismissed;

157. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

TWENTY-FOURTH COUNT - FALSE ARREST ON
BEHALF OF EDWARD JOEDD VASQUEZ

158. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 157 as though fully set forth herein at length;
159. This plaintiff was, without cause or provocation, falsely arrested;
160. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for his life, and sustained severe and other consequential

damages;

- 161. This plaintiff intends to claim punitive damages for all counts;
- 162. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

TWENTY-FIFTH COUNT - NEGLIGENT TREATMENT

ON BEHALF OF EDWARD JOEDD VASQUEZ

- 163. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 162 as though fully set forth herein at length;
- 164. This plaintiff was negligently treated by various members of the "POLICE" of the defendant "CITY", including the defendants herein;
- 165. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for his life, and sustained severe and other consequential damages;
- 166. This plaintiff intends to claim punitive damages for all count
- 167. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

TWENTY-SIXTH COUNT - INVASION OF PRIVACY ON

BEHALF OF EDWARD JOEDD SPARKS

- 168. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 167 as though fully set forth herein at length;
- 170. The aforementioned occurrence constituted an invasion of privacy of this plaintiff;

- 171. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for his life, and sustained severe and other consequential damages;
- 172. This plaintiff intends to claim punitive damages for all counts;
- 173. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**TWENTY-SEVENTH COUNT - CIVIL RIGHTS VIOLATION ON
BEHALF OF EDWARD JOEDD VASQUEZ**

- 174. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 173 as though fully set forth herein at length;
- 175. As a result of the aforementioned occurrence this plaintiff was deprived of her civil rights under the Constitution of the United States and the Constitution of the State of New York as well as other State ordinances, statutes, codes, and rules, including but not limited to 42USC §1981, §1983, §1985, §1988 and 28USC §1343;
- 176. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
- 177. This plaintiff intends to claim punitive damages for all counts;
- 178. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

TWENTY-EIGHTH COUNT NEGLIGENCE ON
BEHALF OF EDWARD JOEDD VASQUEZ

179. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 178 as though fully set forth herein at length;
180. The aforementioned occurrence took place as a result of the negligence of the defendants including but not limited in the defendant "CITY"'s negligent hiring practice of its' employees including the defendants herein;
181. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for his life, and sustained severe and other consequential damages;
182. This plaintiff intends to claim punitive damages for all counts;
183. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

TWENTY-NINTH COUNT - PRIMA FACIE TORT
ON BEHALF OF EDWARD JOEDD VASQUEZ

184. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 118 as though fully set forth herein at length;
185. The defendants, without justification, intentionally acted to physically and emotionally harm this plaintiff,
186. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for his life, and sustained severe and other consequential damages;